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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

JOINT STATUS UPDATE

Judges: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: VIA VIDEOCONFERENCE
Hearing Date: August 23, 2021
Hearing Time: 8:30 a.m.

Since the July 28 conference, the parties have had three mediation sessions, which were held on August 16, August 18, and August 20.

In advance of the August 16 session, the parties each submitted a list of topics to Judge Andler and Mr. Garrie that they hope to resolve in the near term and issues as to which they believed the parties to be at impasse. The parties (i) reached agreement on an amended Rule 53 stipulation and proposed order, which was filed on August 18 (Dkt. No. 728), (ii) resolved a dispute regarding notice pertaining to certain non-party depositions in light of the Order Setting Case Schedule (Dkt. No. 706), (iii) resolved a dispute regarding a specific document Plaintiffs seek, (iv) agreed Plaintiffs would provide amended responses to certain of Facebook's Requests for Production of Documents, and (v) agreed Facebook would complete its privilege review of a document production from PricewaterhouseCoopers LLP no later than August 20, 2021.

The parties also worked with the mediators to address disputes regarding the sufficiency of both parties' document productions, the scope of particular document requests, whether certain document requests can be narrowed, and specific interrogatory responses. The parties and the mediators have determined that the parties have reached impasse on two issues—one relating to TAR and one relating to Mark Zuckerberg's personal notebooks—which they will brief to Mr. Garrie, pursuant to procedures set by him.

Dated: August 20, 2021

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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